

Fill in this information to identify the case:

Debtor 1 FRANK R. SKRAJNY

Debtor 2 JANET E. OWAD-SKRAJNY
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of Pennsylvania

Case number 19-20606-JAD

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: Freedom Mortgage Corporation

Court claim no. (if known):
17

Last 4 digits of any number you use to identify the debtor's account: 2703

Property address: 1108 QUEENS MILL RD
Number Street
Aliquippa, PA 15001
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 07/01/2024
MM/DD/YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: +(b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM/DD/YYYY

Debtor1 FRANK R. SKRAJNY
First Middle Last

Case number (if known) 19-20606-JAD

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x /s/Mario Hanyon Date 06/17/2024
Signature

Print Mario Hanyon Title Attorney
First Name Middle Name Last Name

Company Brock & Scott, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 3825 Forrestgate Dr.
Number Street
Winston-Salem, NC 27103
City State ZIP Code

Contact phone 844-856-6646 Email PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**
Pittsburgh Division

IN RE:
FRANK R. SKRAJNY AND JANET E. OWAD-
SKRAJNY

Case No. 19-20606-JAD

Freedom Mortgage Corporation,
Movant

Chapter 13

Hearing Date: TBD

Hearing Time: TBD

Objection Date: TBD

vs.

FRANK R. SKRAJNY AND JANET E. OWAD-
SKRAJNY,
Debtors
and

Ronda J. Winnecour
Respondent

CERTIFICATE OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE PAYMENT

I certify under penalty of perjury that on this day, I served or caused to be served the Response to Notice of Final Cure Payment on the parties at the addresses shown below or on the attached list.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was:

Via CM/ECF electronic notice:

Lauren M. Lamb, Esq.
707 Grant Street
Suite 2830
Pittsburgh, PA 15219
Counsel for Debtor

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219
Chapter 13 Trustee

Office of the United States Trustee
1000 Liberty Avenue

Suite 1316
Pittsburgh, PA 15222
US Trustee

Via First Class Mail:

FRANK R. SKRAJNY
1108 QUEENS MILL ROAD
ALIQUIPPA, PA 15001

JANET E. OWAD-SKRAJNY
1108 QUEENS MILL ROAD
ALIQUIPPA, PA 15001
Debtor

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, names and addresses of parties served by electronic notice will be listed under the heading "Via CM/ECF electronic notice" and those served by mail will be listed under the heading "Via First Class Mail".

EXECUTED ON: June 17, 2024

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

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Winston Salem, NC 27103

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com